

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

LINDA TAYLOR,  
Plaintiff,

v.

TEXAS SOUTHERN UNIVERSITY,  
Defendant.

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Civil Action No. 4:12-CV-01975

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**TEXAS SOUTHERN UNIVERSITY’S UNOPPOSED MOTION FOR LIMITED  
EXTENSION OF DISCOVERY DEADLINE**

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TO THE HONORABLE KEITH P. ELLISON:

Now comes Defendant Texas Southern University (“TSU”) and files this unopposed motion for a limited extension of the discovery deadline in this case pursuant to Rule 29 of the Federal Rules of Civil Procedure, and respectfully shows the Court as follows:

The Scheduling/Docket control Order in this case sets a discovery deadline of April 30, 2013. (Doc. 8.) In March 2013, counsel for TSU contacted one of Plaintiff’s treating physicians, Dr. Mickey Bush, and requested a date in April 2013 when Dr. Bush would be available for a deposition. In response, Dr. Bush’s counsel informed TSU’s counsel that Dr. Bush would be unavailable for a deposition in April and requested that the deposition be scheduled for late June. (Exh. 1.) Plaintiff’s counsel has stated that she is unopposed to a limited extension of the discovery period solely for the purpose of taking Dr. Bush’s deposition in June, as requested. No other discovery is requested by this limited extension.

Because the agreed extension anticipates discovery beyond the time set for completing discovery, the Court’s approval of such an extension is required under Rule 29.

## CONCLUSION

For the foregoing reasons, TSU respectfully requests that this Court grant this Unopposed Motion for a Limited Extension of the Discovery Deadline and extend the discovery deadline in this case for the sole purpose of allowing TSU to take the deposition of Dr. Mickey Bush outside the discovery period. A proposed order to this effect is attached to this motion.

Respectfully submitted,

GREG ABBOTT  
Attorney General of Texas

DANIEL T. HODGE  
First Assistant Attorney General

DAVID C. MATTAX  
Deputy Attorney General for Defense Litigation

JAMES "BEAU" ECCLES  
Chief, General Litigation Division

/s/ Darren G. Gibson \_\_\_\_\_  
**DARREN G. GIBSON**  
**Attorney-in-charge**  
Texas Bar No. 24068846  
Southern District ID No. 1041236  
[Darren.Gibson@texasattorneygeneral.gov](mailto:Darren.Gibson@texasattorneygeneral.gov)  
Assistant Attorney General  
Office of the Attorney General  
General Litigation Division -019  
P.O. Box 12548, Capitol Station  
Austin, Texas 78711-2548  
(512) 463-2120  
(512) 320-0667 FAX

*ATTORNEYS FOR DEFENDANT*  
*TEXAS SOUTHERN UNIVERSITY*

### **CERTIFICATE OF CONFERENCE**

Pursuant to L.R. 7.1 (D), I certify that I notified opposing counsel, Ms. Lantz, by e-mail on March 21, 2013, of Dr. Bush's request to schedule her deposition in June and requested a limited extension of the discovery deadline for that purpose. On or about March 27, 2013, Ms. Lantz informed me by telephone voicemail that she was unopposed to such an extension.

/s/ Darren G. Gibson  
**DARREN G. GIBSON**  
Assistant Attorney General

### **CERTIFICATE OF SERVICE**

I hereby certify that on April 5, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to:

Peggy J. Lantz  
10497 Town & Country Way, Ste. 700  
Houston, Texas 77024  
[peggylantz@lantzlaw.com](mailto:peggylantz@lantzlaw.com)

/s/ Darren G. Gibson  
**DARREN G. GIBSON**  
Assistant Attorney General